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February 20, 2018

VIA ECF

Hon. Jesse M. Furman
United States District Court
Southern District of New York
40 Centre Street, Room 2202
New York, New York 10007

Re: *Empire Merchants, LLC v. Merinoff, et al.*, No. 16-CV-9590(JMF)(SN)

Dear Judge Furman:

On behalf of plaintiff Empire Merchants, LLC, we respectfully submit this Letter-Motion to Seal pursuant to Sections 1.A and 7.B–C of the Court’s Individual Practices.

On February 5, 2018, Defendants Charles Merinoff and Gregory Baird (“Defendants”) moved this Court for an award of attorneys’ fees incurred, in part, litigating matters under seal in a Maryland federal district court action. *See* Dkt. 86 at 7 & n.3. To properly oppose this and other aspects of Defendants’ application for fees, it is necessary for Empire to discuss sealed filings in Maryland in greater detail. Therefore, Empire is filing on ECF its opposition to Defendants’ fee application with proposed redactions.

Empire’s proposed redactions conform to this Court’s order dated April 25, 2017, in which the Court directed “that all materials previously filed under seal in this matter should be filed publicly, with the limited exception of any document that remains sealed in the Maryland matter and narrowly tailored redaction of the non-public substance of those sealed documents.” *See* Dkt. 53. For the reasons described in my April 24, 2017 letter, Dkt. 58-17, Empire respectfully requests that the Court grant this Letter-Motion to Seal.

Empire thanks the Court for its consideration.

Respectfully submitted,

/s/ Randy M. Mastro

Cc: All counsel of record (via ECF)